



CAPCOA Enforcement Manager's Meeting
January 29, 2015 – 9:30 am to 5:30 pm
January 30, 2015 – 9:00 am to 12:00 pm
Location: Yolo Solano AQMD, Davis

DRAFT MEETING MINUTES (1/29-1/30/2015)

Thursday, January 29, 2015 9:30 a.m.

A. Welcome and Introductions (Bob McLaughlin, All)

1. Agenda Additions/Changes:
 EPA/AIRS topic moved to afternoon after PERP; SCAQMD items moved to morning session.
2. Review/Approval of November 2014 Meeting Minutes: minutes approved
3. New Vice Chair: selection pending
4. Update Enforcement Manager's Roster: change the sign in sheet as needed
5. Meeting Start Times, adjusting start/end times: Bob suggested that meetings start later on the morning of first day to accommodate those that fly in and avoid 2 nights of travel; those present agreed first day start time would be 10am and second day start time would be 8am
6. Future Meeting Schedule and Locations:
 April 9th & 10th in Chico
 July 30th & 31st in San Diego
 October 8th & 9th (1st choice Lake Tahoe) – suggestion was given that Forrest Suites located behind Embassy Suites in Tahoe would be a good option; they have a free facility room.
 Bob will proceed with making reservations.
7. Review of Outstanding Action Items/ Committee Report to Board (McLaughlin)
8. (Jeff Pinnow) shared the possibility of getting a file (shapefile converted to KML file) that shows accurate Air District boundaries. This file can be uploaded into Google Earth and can help determine what District PERP equipment resides in; EPA has non-attainment maps too; ARB could upload this onto their website to help PERP users call appropriate District for notification requirements.

Action Item	Assigned	Date	Status	Notes
AST EVR Issues	McLaughlin	7/1/2015	In Progress	ARB is Working with CAPCOA on changes to the Certification Procedures; CP206 will be released on 3/3/15; mods to CP206 will provide regulatory relief 45 day public comment period going to ARB Board in April
Compile CAPCOA Enforcement Statistics and send to Cal-EPA	McLaughlin	9/1/2015	In Progress	Districts submit statistics by 7/1/15; Include enforcement examples; update report; Complete by 9/1/2015; will request information soon

B. CARB Open Floor Update Report

1. (Jim Ryden) Pay attention to the
 Truck and Bus Regulation (TBR), especially if have an enforcement MOU with ARB;
 a. TBR and sustainable freight are

being linked together; ARB has a long-term goal of zero GHG emissions coming from goods movement; ARB is looking for GHG early action items in 2015; no items have been defined yet.

- b. Enforcing the rule properly is the challenge; it is just one out of seven enforcement rules, but it uses 50% of ARB's enforcement staff.

- c. March 23 board hearing will layout ground work proposal as an update to the board; some programs will not be enforced

- d. TBR Legal Cases: case out of Glenn County; non-profit Alliance for California Business proceeding with lawsuit against CARB, want to enjoin CARB from enforcing the DPF requirement

- e. A lot of the work on TBR comes from the many paths that people have to come into compliance with the regulation; ARB works with small companies and the loan program that gives loans to companies that have been denied from other major banks.

- f. Jim is going to retire in July.

- 2. (Steve Brisby) CalEnviro Screen released; may be funding available from Cap and Trade funds for EJ designated areas. Fresno was the worst zip code; then next 9 are from SCAQMD.

C. CARB Training Update for 2015 (ARB, All)

- 1. (Leisa Bush) Mutual Settlement training class may be better organized as a CAPCOA effort

- 2. (Bush) Training Requests from Districts, VEE Schedule: 52 VEE classes, certified 2300 people; one issue that has come up - hard to notify people of changes to the class if they don't pre-register; suggest class participants pre-register so they get the most up to date information; ARB will put updates on website in the near future

- 3. (Bush) Release of HARP: Matt O'Donnell will be in Santa Barbara for class; classes will be more intensive as time goes by.

- 4. (Bush) Looking for new learning management system that can help communication between CARB and participants, provide updates (spurred by recent communication issues with night cert time changes)

- 5. (Jeff Lindberg) Cross-Training with Air Districts: would like to get field training for some ARB inspectors; asked group if there is a mechanism to get cross-training with District staff; most Districts were open to having staff come out and go on inspections with their staff.

- 6. (Bush) 18-month release of training guide: internally have schedule through June 2016; don't want to release until have rooms available; ARB can share the schedule with Districts early; Leisa will send to Bob for distribution; should be ready end of February, beginning of March. Dan/Teresa requested VEE class schedule be available earlier so that locations can be adequately reserved.

- 7. (Managers) would be good for engineers and inspectors to have training on source test observations at GDFs; will future training through ARB be paper-based or onsite to observe tests being performed? (Bush) looking to have online video training options that can augment onsite training. Will help inspectors know when a contractor is cutting corners so a video of both the right way and the wrong way would be a good idea; (Kett) SDAPCD has videos that have worked well for training; (Pinnow) onsite is still a good idea, had used a training opportunity as part of a settlement negotiation (SEP).

- 8. (Mohsen Nazemi) PERP training in SCAQMD in March; is that from ARB? (Bush) Yes, it is.

- a. (Nazemi/Bush) want to make sure

CAPCOA "Explanation & Examples of Uses of PERP" paper is part of the training; ARB concurred that this is important to include and thinks Districts should participate in the training so they can talk to Industry present.

- b. (David Grose) important to have decision-making person on site to deal with some of the bigger questions.
- 9. (Nazemi) SCAQMD is going to hire about 12 new inspectors and will need training. (Juan Ortellado) will be hiring about 4 inspectors.
- 10. (Lindberg) On-boarding: ARB requested on-boarding procedure from BAAQMD; Oulrey and Bush confirmed that this is an important part of determining training needs.
- 11. (Eric Kett) local DA chief investigator started up enforcement task force that includes multiple agencies, EPA, local code enforcement, F&W, water; it's a great way to share information and get the right groups involved.

D. USEPA Open Floor Update Report (Matt Salazar)

- 1. Working with north coast biomass plant and ammonia slip issues; ARB (Ben Sehgal) may be able to help them figure out where to get an ammonia monitor.
- 2. Working with ARB TBR enforcement; first NOV issued soon, press release coming soon; 5-6 NOVs will be issued in the next few months; settled some small cases under \$10K;
- 3. GMAP project; NEIC out of Denver doing complex inspection and monitoring of methane, benzene, toluene; will be doing work with SCAQMD, up to 100 facilities to do some inspections to check for fugitive emissions; their goal is to observe, not enforce.
- 4. Trader Joes CFC case press release soon
- 5. State review framework report; rotational auditing program; AZ reviewed last year; EPA actions taken

E. AFS/AIRS/ECHO/FRV/HPV (McLaughlin, Salazar): District concerns about extra work CA districts may have to do compared with what districts thought what was required; Bob wants clarification from EPA;

- 1. (Dan Searcy/ McLaughlin/Districts) concern expressed about ICR requirements and that it contradicts the CMS, FRV, HPV policies; ICR has estimate of burden that may not reflect reality; reporting is burdensome without direct air quality benefit; (Salazar) region 9 understands how CA works; EPA wants to provide transparency; discussion about what ARB looks for and what District should report.

F. Portable Equipment(All, ARB)

- 1. District Issues:
 - a. (Paul Hensleigh) discussion on home district designation, changing home district off-cycle; (Mike Guzetta) because the inspection fee is tied to the initial inspection and renewal, they should not change the home district off-cycle; talk to ARB about "double-District" cases.
 - b. Discussion about who writes a violation, home district vs. district where violation took place. (Searchy/McLaughlin) home districts should write violations for fleet averaging, other districts should write violations for observed emission/operational violations.
 - c. two-engine equipment discussion (only several types of equipment allowed into PERP), repower issues for some equipment so had

to figure out a solution, some equipment have to register in both DOORS and PERP. No plans of taking PERP ATCM to board.

2. (Jimmy Aguila) Enforcement
Updates: 30 reports received since last November
3. (Jimmy Aguila) Drought & Non-Certified Equipment Update: (7) Forms 40 received since last November
4. (Guzetta) PERP database update:
ETL (extract, translate, load) caused problems; some issues have been resolved; procurement exercise to get new contract to finish database work could be long process, but at least many technical issues have been resolved thus far.
5. (Guzetta) Doors vs. Portable
Update:
 - a. Possibly 500 engines that are in DOORS that should be in PERP; ARB will coordinate with districts on equipment location
 - b. Coordination with DOORS staff continues; off-road program focuses on vehicle, not engine; PERP staff needs engine data, not vehicle data to verify eligibility; leads to some inherent difficulty.
 - c. Off-road staff working on internal procedures to avoid situation in the future, e.g., website may include initial questions that sends non-self-propelled equipment owners to PERP site
 - d. Proposed that there be a CAPCOA point of contact to work on this going forward; discussion about whether to write an NTC or NOV for these companies.
 - e. Track-mounted is considered mobile and therefore not eligible for PERP; District can require a permit of the equipment even though it can't be registered in PERP; various location permit for equipment that operates at multiple locations and allows for toxics to be analyzed at all locations; permit may limit time the equipment is allowed to operate.
6. (Grose) SMAQMD issued the permit for Granite Construction that allows multiple locations and multiple pieces of equipment to operate within a certain footprint

G. Training Presentation – EPA/NCOA (Mary Boyer):

1. APTI / NETI were older training programs
2. EPA 105 grant money supports program
3. 32 different courses offered at national level; 335, 345 are good courses
4. To schedule any training sessions contact Mary at 4mboyer@gmail.com; 916-995-4164
5. Minimum 10-35 staff participating for them to give a class
6. No cost to districts, but district must provide training site and projector
7. Trainers will need at least a month to set up a training session

H. Air-Only Enforcement Symposium (Ryden/Searcy)

1. (Ryden) ARB willing to run a small-scale symposium again

2. Discussion on who should participate - air districts, supervisory and/or staff, EPA region 9?
3. CAPCOA should arrange venue and it should be 2-3 days at minimum
4. (Kett/Teresa Sewell) because of the turnover of experienced staff it's important to have the symposium; supervisor training is important, ultimate responsibility for inspectors and their actions;
5. Symposium could have various topics that are important to Districts:
 - a. How to run efficient mutual settlement program; different methods of settling cases; small claims court; good for small districts that have problems settling cases
 - b. Report writing and case development if it goes to litigation; getting successful litigation needs the proper presentation of evidence; personal phones are subject to discovery;
 - c. How to present cases, lawyers vs. DAs motivations, how to be a witness
6. Working group volunteers ... Bob, Eric, Dave, Carla, Leisa, Jeff, Kevin; will discuss attendance, budgeting, etc. during conference call late February/early March.

I. SCAQMD Enforcement Case Updates (Nazemi)

1. Exide: facility shut down since March 2014 after abatement order; DTSC has taken enforcement action on 8 NOVs; \$15MM pollution control system to be completed soon; 1420.1 compliance requirement has tighter lead standard than EPA (EPA has 90-day rolling day average vs. 30-day rolling average measured every 3 days); there are also arsenic emissions from site; SCAQMD adopted a rule for arsenic, benzene to deal with fugitive emission releases from open-top furnace; there is now a negative pressure requirement and measuring requirement in rule; other issues happened while repairs of A-pipe where being done; issued 29 NOVs because of lead emissions during this process; ATC released and risk reduction plan approved; hearing board hired firm to gauge and submit weekly reports to SC; April/May timeframe for completion; Exide in chapter 11; SC in line with other creditors
2. School District in Huntington beach, Oceanside; roofing material containing asbestos discovered at 11 different school sites during renovations; 3 schools shut down; analysis and remediation costs \$8MM, economic issues for school districts; has raised community concerns about school safety
3. Metal processing facilities (Tamco): sulfur dioxide emissions from steel re-bar; 30T/yr emission source; asked for 20T based on 1989 levels; SC denied their request; lawsuit pursued & settled in favor of SC
4. Metal forging facility in Paramount City: school near facility, teacher complained about burn metal odors; high level of Ni near housing tracks discovered in samples taken; actions taken ... grinding operation put in complete enclosure, baghouses will be converted to HEPA filters and a taller stack installed; SC adopting new rule 1430 for grinding operations at metal facilities
5. Sunshine Canyon landfill public nuisance case: involved community (1000 complaints/year); multiple public nuisance violations issued; no proper gas extraction system, new wells being put in, these new wells get flooded from leachate; company hired to do site studies. (Ortellado) BAAQMD has similar case; well organized community against landfill expansion; some odors verified; composting site and WTP nearby so difficult to confirm source; hearing board meets on expansion request; decision may have effect on complaint numbers

6. (Nazemi) Will hire one or more contractors that will go into refineries and verify reporting accuracy for atmospheric relief valves; some are difficult to observe and SC wants to make sure they are there and actually working. Want to verify there are no bypass spots along length of pipeline prior to the sulfur meters; settlement of \$6MM reached on open flange case
- J. Introduction to Bob Nichols w/ CDAA (California District Attorney's Association): he is one of four attorneys that works on the CDAA prosecuting project; typically work in smaller regions that don't have resources to deal with companies trying and circumvent regulations; also teaches at the basic inspector academy (FLETCE class in San Luis Obispo) where they link a regulator and enforcement officer together for training to get people the knowledge of what other agencies do and make sure people are aware that other groups need to be involved. Districts can nominate a pair of people to take class, send him names.
- K. Toxics Committee Update (Leland Villalvazo)
 1. ARB estimated 3.5 times the acceptable risk, but might be slightly higher; CAPCOA board approved that policy so prioritization can continue.
 2. Waiting to finalize risk assessment manual; OEHHA needs to finish the revised version of HARP and approve the final guidelines; revised policy items are currently with the sub-committee; released mid-February; all new guidelines will be approved by OEHHA, then Districts will have to figure out how to implement what new policies are needed; each district will have very different ways to handle it; first couple years will be difficult to fully know what the effects of the revised risk assessments will be. The released policies will be given to the Enforcement Managers for review.
 3. Future TARMAC activities – try to assist one another and help smaller districts in training and provide assistance. Send him an email with any questions.
- L. Diesel Regulations / MOU (ARB) (Paul Jacobs)
 1. TBR litigation: case in Glen County Superior Court, litigants seeking injunction; if enjoined--appeal to 3rd District Court would be necessary.
 2. 3.4 MM in funds collected from diesel fleet cases in 2014.
 3. New deadlines for light-duty trucks; new truck models with SCR technology engines required.
 4. Do Districts get calls and walk-ins on TBR? Sometimes and they are referred to ARB/1-866-6Diesel
 5. Cut-points and opacity: new trucks and buses should not be smoking; report smoking vehicles.
 6. University of Denver and UC Berkeley remote sensing research teams sampling trucks to determine emission profiles and identify high emitters.
 7. Rolling coal issue: nationwide survey and highway patrol enforcement; ARB enforcement of part manufacturers; settlements have gone forward; rolling coal is both a public health nuisance and safety issue; if observed, report license plate numbers to Paul/ARB.
 8. Tractor-Trailer GHG program: USEPA issued waiver for ARB's program---industry can challenge waiver until the end of Feb 2015.
 9. Waste Hauler injunction/investigation; all DPFs were gutted and operating in non-compliance
 10. Training for mobile sources and diesel regulation is available and on-going
 11. (Tina Diaz, ARB) Off-road regulation (ORR) performance standards
 - a. ORR enforcement began July 2014

- b. Waiver in Sept 2014 for large fleets
(HP fleet average or BACT);
- c. Auditing 18 companies for
compliance with TBR, TRU, and ORR. Approximately 14 companies moved their fleets out of state
and failed to notify the state of their move.
- d. Next phase of reporting begins
March 2015; DOORS database manager reviews reports to see what companies need follow-up.
Must verify vehicle retirements and additions to make sure rules aren't circumvented.
- e. Annual reporting requirements:
violations are mailed; if not cleared then litigation is started;
- f. DOORS website link to report non-
compliant companies/vehicles – 28 complaints lodged; one came from a local district; preferably
photos sent in include company logos, license plate numbers, equipment photos; all this
information can be uploaded and emailed with complaint
- g. Cases for not labeling; waiver gave
authority to require label on both sides of equipment
- h. VDECS: cost of retrofitting, people
are going on line to find cheapest VDEC, installers charge \$5000-7000 to install, finding companies
that have not installed correctly; can't use filters on OEMs and put it on another truck, it is
considered an illegal modification. There are specific SN for filters for each truck it is installed on.
- i. 2015 priorities report was recently
released

M. **Engineering Committee Update (David Lusk; PowerPoint presentation)**

- 1. New committee chairman is Chris
Collins from Mojave
- 2. GHG Protocols reviewed
- 3. OEHHA health risk effects at GDFs
(2-3 times the existing risk)
- 4. OEHHA effects on permitting DICE
reviewed
- 5. Training: basic engineering, PSD,
Oil & Gas training, Health & Safety class encouraged participation
- 6. Challenges for coming year:
a. OEHHA health risk changes,
incorporating/revising GHG requirements in permits, GHG Rx protocol review, composting
operations, local jurisdiction over permitting on non-reservation tribal lands, implementing new
delegated federal PSD programs
- b. 111d and 111b reviewed
- c. GDF emission factors
- d. Permitting database and
automation work
- e. PERP Examples
- f. Continued CAPCOA participation in
the ARB composting and oil and gas workgroups

N. **SCAQMD Briefing on EPA EJSCREEN (Nazemi; presentation slides sent previously to group)**

- 1. Not a CA-based tool and not like
CalEnviroScreen, but is EPA's tool to determine priorities between regions;
- 2. Difficult to get accurate

comparisons between regions for different parameters; trying to get consistency between regions; mapping overlay of 12 environmental indicators can be helpful (PM, ozone, diesel PM, lead, traffic proximity, NPL (Superfund), and others); air districts will not use this to determine enforcement priorities, but will rely on actual emissions in region;

3. release - going public before June 2015; Tool seems to be fast-tracked for
4. misleading and misrepresented by some groups/media. EJ screen data can be confusing and
5. presented; they are looking for feedback NACAA webinar on EJ screen
6. webinar for Districts so that it can be reviewed and questions answered. Bob and Mohsen will work with Matt on setting this up. (Salazar) recommended setting up a
7. some similar issues as EJ Screen, interpretation of data can be misleading; the tool can be used inappropriately in some cases (Whynot): CalEnviroScreen has
8. Screen should be used as a screening tool, not as a decision-making type tool. (Nazemi) Like personal monitors, EJ

O. (Nazemi) SCAQMD use of smart phones by inspectors: inspectors have been using smart phones; great use to access to emails, databases; very useful for afterhours communication; can work with staff and supervisors very easily; no reason that inspectors shouldn't use this technology; can make job more effective; tablets can be cumbersome vs. phones; inspectors still liked to take notes and so didn't like use of tablets during inspection;

1. personal cell phone replacement and stipend pay, download policy restrictions, non-approved overtime work, tethered phone/laptop use discussion Other related issues discussed:
2. technology can be instituted in the field; report writing, tablets, etc. Discussion regarding other ways
3. applications – complaint app and no burn day app. Internal development of

P. Enforcement of wood-stove/fire place restrictions (All) (discussion to be continued to 1/30/15)

1. successfully sued a neighbor for excessive smoke from a fireplace; SBAPCD is working on a door hanger outreach item. (Kett) A Santa Barbara complainant

Q. Potential Amendments to Special Advisory 405-B (McLaughlin)

1. seems to require a response to an alarm; every warning alarm would require a service provider to come out; Bob put together proposed language; ARB requested that originally proposed draft advisory should be put out for now with a promise to give the whole topic a more holistic review by November 1, 2015. Grose supported that approach. Extending deadline through March:

R. Interagency Refinery Task Force (Whynot)

1. stimulated the formation of the Governor's Interagency Refinery Task Force in an effort to improve public and worker safety; many agencies participating The Chevron refinery fire
2. Prevention; Emergency Preparedness and Response; and Enforcement Coordination; 1st two work on 3 work groups: Safety and

- regulations and interagency cooperation, 3rd works on how agencies can coordinate and participate in joint training, inspections, and enforcement cases
3. management components of revised draft regulations are being finalized right now. Draft regulations include provisions to foster safety culture, root cause analysis and other requirements to improve refinery safety and risk management Process safety and risk
 4. response and community safety; looking at toxics issues CUPAS working on emergency
 5. fence-line and within-perimeter monitoring Monitoring work group looking at
 6. different agencies coordinate; looking to have a common website Quarterly meetings to ensure
 7. safety forums have occurred in northern California and are being set up soon to engage and seek input from community and industry; feedback suggests need for expansion beyond refineries to other related industries, e.g., propane storage; this will likely occur in the future; joint training might be on the horizon Education and outreach to public –
 8. impose high penalty for the Chevron fire; need more regulatory authority; inter-agency help is necessary during these events; important to remember that different agencies have different roles and different perspectives: CUPAS, fire agencies have an on-the-ground view and provide immediate onsite activity reporting, while air districts need to fully investigate & analyze before releasing information, important to try and avoid erroneous preliminary reporting. (Nazemi) CalOSHA was not able to
 9. being put together that will clarify what roles different agencies have (Whynot) There is a document
 10. would be valuable to look at what notification systems different air districts have in place and get recommendations. Crude by rail is a topic of interest;
 11. place for maintenance? (Whynot) unclear at this time whether there will be direct regulations on maintenance or if those requirements will be put into site-specific plans. (Oulrey) will there be rules put in
 12. report came out on 1/28/15 in San Francisco Chronicle (Oulrey) US Chemical Safety Board
 13. division (specific to refineries) that does almost exactly what Jill has been talking about. Companies pay for the multi-agency staff time spent to perform onsite inspections. (Kett) Santa Barbara has an energy

Action Items:

2. New Vice chair selection
3. October meeting location change
4. Changing start times for future meetings
5. Enforcement stat submittal
6. EPA (Matt/Bob) to discuss EJ Screen webinar
7. District PERP reporting improvement request by ARB
8. Conference call for Air-only Symposium
9. Bob to recommend 405-B go forward

Friday, January 30, 2015, 9:00 a.m.

S. CAPCOA Liaison Report (Jim Wagoner)

1. Relations with ARB are positive
2. Main topics CAPCOA will continue to work on:
 - a. OEHHA
 - b. Moyer Funding and legislative changes
 - c. Woodstove Funding to address PM2.5 non-attainment
 - d. GHG Rx protocols
3. Rick McVeigh will be the interim director until a replacement is found for Ken Koyama

T. Enforcement of wood-stove/fire place restrictions (All) ... cont'd from 1/29

1. (Nazemi) SCAQMD is looking for wood smoke program information from other districts
2. SJVAPCD, SMAQMD, BAAQMD, and other districts provided information
3. BAAQMD is revising their rule, have funding for change outs, and have a FLIR camera in use

U. Vapor Recovery (Lew/Dinkler/Districts)

1. Sub-Committee Update (Lou Dinkler and Scott Bacon)
 - a. Program update (presentation slides available):
 - 1) Topic 1: Phase 1 EVR for AST and ECO nozzles (going to board April 2015)
 - a) Allows for continued use of existing pre-EVR phase 1 systems on AST
 - b) Existing tanks -- switch from state to federal ozone standards
 - c) Improve cost effectiveness of program, provide relief to 2/3 station owners
 - d) Proposed map for continued use of pre-EVR Phase 1:
 - (Green) areas in federal attainment not subject to Feb 2014 advisory
 - (Yellow) areas subject to change out if >60K throughput
 - (Orange) areas where stations with >18K throughput require upgrade
 - (Red) SCAQMD, upgrades are required regardless
 - e) (Whynot): how does this affect advisory requirements and risk factors? (Benjamin) Existing stations won't be re-evaluated, only during new or modified permits evaluation will this come up; (Bacon) Districts can handle risk assessment as needed
 - f) Replacement components: pre-EVR components must be replaced with EVR components; draft list of compatible components advisory will go out in Feb 2015; enforcement may be done at the end user side or through some sort of prohibition of sale on mfg side. (McLaughlin) Outreach needs to go to service contractors that install equipment too.
 - g) Discussion on ECO Nozzles: their use, liquid control rate, price of nozzle may be greater or lower depending on what station has been using in the past; overall statewide there should be a cost savings; could have a national effect if adopted elsewhere; desire a

conventional hose and fitting so it can go nationwide; CP requires use at certified all-ORVR facilities. If they are exempted from Phase II then the 4-year clock begins to change out to this new equipment.

- h) Rulemaking timeline: 45-day comment period begins March 3; Board hearing April 2015; Early 2016 ECO nozzle certification anticipated
- 2) Vapor recovery equipment defect list (VRED): if have VRED violation can tag it out at time of inspection; rulemaking required every three years; usually an easy process, this just formalizes the list, usually no comments are received during rulemaking process
 - a) Public workshop March 4, 2015
 - b) Staff Report August 2015
 - c) Executive officer hearing if requested Oct 2015
- 3) Overpressure issues
 - a) Scope of Problem: 7400 ISD stations; 70% have Healy Assist, remainder Emco or VST
 - b) Prevalence of alarms: clear relationship in increased alarms in winter time, pressure while dispensing (PWD), and a 2° increase in alarms over time as ORVR vehicle penetration increases; 10% of summer alarms are equipment problems; 90% are likely due to operating hours where there are extended shutdowns and then high volume throughput.
 - c) Slide 15 (ullage and UST pressure graph): PWD; looking at last 30 hours of data pressure stays negative during dispensing; during shutdown the pressure begins to increase as expected. Lower graph shows non-typical response - increased pressure at 5" w.c. throughout the entire 30-hour period
 - d) Slide 16: summer fuels at a balance site show negative pressure and only a small release compared to winter fuel that shows less negative pressure maintained and a longer positive pressure duration
 - e) Emission Impact, Contributing Factors and and Strategies Discussion:
 - We may need to change the way we certify stations because of site specific parameters; (Benjamin) very draft and conceptual concepts, seeking feedback from districts; trying to find a way to balance variety of conditions observed while trying to avoid unnecessary costs for station owners. Districts expressed concern about station by station analysis and impact on staffing resources; Districts suggested general categories may be developed; ARB agreed this is something they are investigating;
 - (Whynot) regional temperature differences may affect emissions and influence attainment status; (Dinkler) no strong correlation observed between region and temp
 - (Tokagawa) is there a correlation between sites exhibiting PWD w/ variable or single-speed turbines? (Dinkler) maybe, but no strong correlation found in recent testing.
 - (Danny) some balance systems may not exhibit overpressure because of leaks in the system; (Searcy) appropriate tests should be done before doing other site testing;
 - (Kett) vent pipe on some ORVR vehicles could be a factor;
 - (Dinkler) want to fully assess all potential factors before saying one system is better
 - (Danny) Stations that are well-maintained and leak-free have more issues;
 - (Seracy) small stations have been greatly affected by equipment costs;
 - (Nazemi) what's the cost of maintaining the system overnight? (McLaughlin) more alarms will be found with greater ORVR penetration & greatest issue is daytime PWD;
 - (Pinnow) maybe can we look at changing the cracking pressure of the PV valve, there should be a problem for the tank; (Benjamin): it's harder to certify at a lower cracking pressure; (Lew) some push-back from manufacturers on increasing the cracking pressure; (Searcy) if do that you will really have to make sure that other parts of the system are tight; (Benjamin) all test results will have to be revised
 - f) Solutions: ORVR recognition issue, will be working with Mobile Source group to deal with fill pipe issues; relax ISD overpressure alarm threshold; require additional processing

capacity, if risk assessment won't allow this then will have to reevaluate; control winter gasoline RVP; some combination of all of these potential solutions.

- g) (Nazemi) is ARB looking into natural gas stations to regulate methane emissions for GHG reduction measures? (Benjamin) not at this time for several reasons
- h) Regulatory Development Process: continue working with CAPCOA VR subcommittee
- i) Next Steps: complete additional field studies, public workshops to discuss study and findings of field study, consideration of risk assessments guidelines, public workshops to discuss regulatory proposal, Board hearing December 2015
- j) Dispute on-going between assist and balance sites – not clear yet which works best